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April 18, 2025

BY ECF AND EMAIL

The Honorable Katherine Polk Failla
United States District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: In re Tether and Bitfinex Crypto Asset Litigation, No. 19 Civ. 9236 (S.D.N.Y.) (KPF)

Dear Judge Failla:

We write on behalf of the B/T Defendants in opposition to non-party Khadija Sharife's April 11, 2025 motion to unseal or redact unspecified records in this matter (Dkt. No. 599, the "Motion"). The Motion does not present any reason for the Court to deviate from its prior orders and should be denied.

The Court has already considered and granted the parties' motions for leave to apply narrow redactions to previous filings and to maintain under seal certain exhibits thereto, primarily in order to protect the B/T Defendants' highly sensitive business information and the safety and confidentiality of the Anonymous Trader. (*See, e.g.*, Dkt. Nos. 530, 544 at 50-54, 554, 558.) The Court's decisions are squarely in line with well-established authority. *See Binh Thanh Imp. Exp. Prod. & Trade Joint Stock Co. v. Amazon.com Servs. LLC*, 2024 WL 418139, at *1 (S.D.N.Y. Feb. 2, 2024) ("[C]ourts in this District routinely permit parties to seal or redact commercially sensitive information to protect confidential business interests and financial information."). The parties are currently briefing Plaintiffs' motion for class certification, and the Court has approved the parties' joint request, "for the sake of efficiency, and to facilitate a streamlined review process for the Court," to confer and file proposed redactions to the parties' briefs and supporting materials following the submission of all such materials. (Dkt. No. 595.)

The Motion provides no basis to reconsider these decisions. An assertion that sensitive information concerning the B/T Defendants and the Anonymous Trader may have been "leaked" certainly is not a reason to lessen its protection in this Court.

Respectfully submitted,

/s/ Elliot Greenfield